

# **Exhibit A**



## Keith Zahniser, PhD

### Senior Historian



Keith Zahniser joined HRA in July 2007 after spending five years teaching U.S. history at the university level. He holds a PhD in U.S. history from the University of California, Santa Barbara. As a consultant, he has developed an expertise in establishing the historical processes, production, and waste streams of operations at hazardous waste sites, tracing corporate genealogies, and documenting government-private production relationships during wartime. He has researched and written on the historical contributions to contamination at complex multi-party Superfund sediment sites and the land use and history of manufacturing and military entities. He has also researched and written on the administrative history of the U.S. Army Corps of Engineers and on the historical management and use of natural resources on Indian reservations, tribal bed and banks ownership, and the legislative history of dams and their effects on reservations.

### Environmental Litigation

Contaminated Military Site in the Midwest, 2022 to present **[Confidential]**

Senior Historian and Consultant for research on a contaminated former military base. Conducted research in the National Archives and online to determine the source of TCE contamination from the World War II era.

Contaminated Site in Southern California, 2015 to present **[Confidential]**

Senior Historian and Project Manager for research on a contaminated southern California site. Wrote an expert historical report and expert rebuttal report. Will be deposed and will testify at trial in 2023. HRA also researched, reviewed, and summarized historical sources of environmental contamination, compiled collected historical documents into a useful database, conducted original research at California repositories, and consulted on historical issues for ongoing litigation.

Contaminated Site in the Midwest, 2021-2022 **[Confidential]**

HRA conducted online research to determine the source and nature of contamination at a site in the Midwest. This included historical newspaper and company history research to determine the site use and operational history of a railroad and industries surrounding the contaminated site.

Contaminated Site in the Midwest, 2020-2021 **[Confidential]**

HRA conducted targeted historical research on the alleged deposition of PFAS in a Midwestern city. HRA researched online for historical information on possible sites of deposition and on PFAS use among local industries.

Contaminated Site in the Midwest, 2020 **[Confidential]**

Senior Historian and Project Manager for research on a site in the Midwest with ongoing nuclear contamination from storage of nuclear residues during World War II.

Historical Railroad Operations, Northeastern U.S., 2018-2020 **[Confidential]**

Senior Historian and Project Manager for investigation developing a historical record of ownership and activities at several railroad yards, stations, and shops in the Northeastern United States. HRA conducted research at local repositories, state archives, the National Archives, and in online databases. Document collection and analysis focused particularly on tracing the development of, and changes in electric locomotive equipment resulting in polychlorinated biphenyl (PCB) contamination.

### Education

PhD, History, 1997,  
University of California,  
Santa Barbara

MTS (Master of  
Theological Studies),  
Religion and Culture,  
1990, Harvard Divinity  
School

BA, History and French,  
1987, Ohio State  
University (Summa cum  
laude with honors in  
liberal arts and  
distinction in history)

### Qualifications

Meets the Secretary of  
the Interior's  
Professional  
Qualification Standards  
in History

### Professional Affiliations

Society for History in the  
Federal Government  
(SHFG)

National Council on  
Public History

American Bar  
Association (Associate  
Member), Section of  
Environment, Energy,  
and Resources

Corporate history, 2019 <u>[Confidential]</u>	Project Manager for company history research. HRA conducted research into the history and product development of a company producing home products containing per- and polyfluoroalkyl substances (PFAS). HRA researched at the Library of Congress and in corporate records at a state historical society.
Contaminated New Jersey Former Manufacturing Site, 2017-2019 <u>[Confidential]</u>	Senior Historian and Project Manager for investigation into source of contamination at a former New Jersey manufacturing site. HRA researched at the National Archives, the Library of Congress, and in online sources for the products, processes, and chemicals used in World War II and post-war production of materiel resulting in PCB contamination.
Contaminated Michigan Manufacturing Site, 2017-2019 <u>[Confidential]</u>	Senior Historian and Project Manager for research into contamination of a former manufactured gas plant site in Michigan.
Contaminated Army Base in Washington, D.C., 2016 <u>[Confidential]</u>	Senior Historian and Project Manager for research on the historical sources of environmental contamination on the campus of a former Army Medical Center in Washington, D.C.
Contaminated New York Waterway, 2014-2016 <u>[Confidential]</u>	Senior Historian, Project Manager, and Co-author of reports on potentially responsible parties along a contaminated waterway in New York that is now a Superfund site. HRA historians completed research in a wide range of archival repositories in New York City and Albany, as well as at the National Archives in Washington, D.C., to obtain primary historical information relating to entities that operated facilities along a contaminated New York waterway. In addition to completing intensive research, the team prepared detailed reports summarizing the findings.
Contaminated New Jersey Waterway, 2011, 2016 <u>[Confidential]</u>	Senior historian, Project Manager, and Principal Investigator for research on a contaminated New Jersey waterway. HRA historians researched the production volumes and processes of an industry situated on the banks of a major New Jersey industrial waterway. HRA's historians conducted extensive research in the National Archives in Washington, D.C., and College Park, Maryland, the Library of Congress, the New Jersey State Archives, the New Jersey Historical Society, business and chemical libraries, and other local document repositories.
Contaminated site in North Carolina, 2015 <u>[Confidential]</u>	Senior Historian, Project Manager, and Principal Investigator for research on a contaminated site in North Carolina. HRA historians traced the corporate histories of parties that had occupied a contaminated manufacturing facility in North Carolina and helped to determine the production volumes and processes of historic operations on the site.
Manufactured Gas Plant in Tennessee, 2015 <u>[Confidential]</u>	Senior Historian, Project Manager, and Principal Investigator for research on a manufactured gas plant in Tennessee. HRA historians conducted historical research to establish the history and operations of a manufactured gas plant in Tennessee and its potential contribution to contamination of a nearby waterway.
Contaminated Manufacturing Plant Site, 2012-2013 <u>[Confidential]</u>	Senior Historian and Principal Investigator for research on a contaminated manufacturing plant site. HRA historians researched the production history and associated government contracts for an aircraft manufacturing plant in southern California that held numerous government contracts for production of many types of aircraft for the War Department. HRA concentrated its research in the extensive military records held by the National Archives and Records Administration, College Park, Maryland, investigating production volumes and processes, materials used and waste streams generated, and the extent of government control of the plant in wartime.

Formerly Used Defense Site Potentially Responsible Party Search, 2011-2013 <u>[Confidential]</u>	Senior Historian, Project Manager, and Principal Investigator for research on a formerly used defense site. HRA historians prepared a site ownership and operational history of an Indiana steel mill involved in the U.S. nuclear program in the 1940s, conducting research in the National Archives facilities in Washington, D.C., College Park, Maryland, and Atlanta, Georgia, and in local and state records in Indiana. HRA also conducted oral histories and produced an extensive written report summarizing research findings.
Contaminated East Coast Waterway, 2012 <u>[Confidential]</u>	Senior Historian, Project Manager, and Principal Investigator for research on a contaminated East Coast waterway. HRA investigated corporate successors for a nineteenth century chemical plant's pollution in the New York City area.
Contaminated Manufacturing Plant Site, 2011-2012 <u>[Confidential]</u>	Project Manager and Principal Investigator for research on a contaminated manufacturing plant site. HRA historians researched the site ownership and production history of a factory owned by a major pharmaceutical company on a New Jersey property. Research was conducted in the National Archives and at the Library of Congress.

## Native American Litigation

Native American Litigation <u>[Confidential]</u>	Senior Historian in suits brought by tribes and individual Indians against the United States involving the history of reservation boundaries, rights to the bed and banks of reservation rivers, compensation for land takings, and the management of natural resources on Indian reservations in Oklahoma and North Dakota.
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## Administrative Histories

History of the Indiana Central Canal and Holcomb Gardens <u></u>	The USACE Office of History awarded HRA this project to write narrative histories of the Indianapolis Central Canal and the Holcomb Gardens, and to design and print 100 bound copies of each manuscript and 500 copies of a tri-fold pamphlet illustrating the most important information about the Indianapolis Central Canal. HRA partnered with cultural research management firm Gray & Pape to research and write the two manuscripts, which detailed the information necessary for a National Register multiparty nomination describing the architectural, cultural, and historical significance of these sites, with a more developed historical context based on additional historical research. HRA partnered with design firm Bryan Potter Design to design and print the manuscripts and pamphlet.
USACE CEHO Historical Support Services <u></u>	Supervisory Historian for U.S. Army Corps of Engineers (USACE) Historical Research and Support Services IDIQ. Under an IDIQ with the USACE Office of History and teamed with Winthrop Group and Bryan Potter Group, HRA performed a number of historical research and writing, archival, and interpretive exhibit design services related to the history of the USACE. Projects included digitizing archival materials at the Office of History's archives, developing interpretive content for an exhibit at the Pentagon, and researching, writing, and editing book-length histories of the USACE's disaster response program, the USACE's role in the American Revolution, the Los Angeles District, the Wilmington District, and the Willamette Valley Project.

USACE CEHO  
Disaster Response  
Single-Volume  
Comprehensive  
History

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Supervisory Historian and Project Manager for USACE Historical Research and Support Services IDIQ Task Order Request 2, Comprehensive History of USACE Disaster Response Mission for the USACE Office of History. HRA teamed with Damon Manders, author of numerous volumes on USACE history, to complete an engaging and well-illustrated 40,000-word one-volume overview history of the USACE's Disaster Response mission.

HRA worked with the subcontractor to conduct the necessary research to write the entire manuscript. The research was conducted primarily on published primary and secondary sources, including USACE reports; Congressional reports, hearings, and records; newspapers; biographies, memoirs, and published papers of notable individuals; general histories of the U.S. Army and USACE; scholarly journal articles; and published books. HRA was responsible for locating, reproducing, captioning, and crediting a minimum of 125 images for the manuscript. HRA reviewed and edited each chapter as it was written and provided a thorough copy edit of the complete draft manuscript.

Multi-Volume  
History of the  
Disaster Response  
Mission, U.S.  
Army Corps of  
Engineers

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Senior Historian and Project Manager for project to locate images and revise a manuscript narrating the history of the USACE's disaster response mission from the 1980s to the present. HRA has conducted research at the National Archives in College Park, Maryland, the National Records Center in Suitland, Maryland, and the Army Corps Office of History archive at Fort Belvoir, Virginia, and has performed extensive online searches. HRA collected images for projects completed during this era and compiled them in a database. HRA also produced an illustrated report of the USACE response to the Mount St. Helen's explosion.

History of the Far  
East District U.S.  
Army Corps of  
Engineers

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Senior Historian and Technical Advisor for production of a history of the USACE Far East District's history since its founding, entitled *Building Strong in Korea: A History of the U. S. Army Corps of Engineers, Far East District*, published in September 2019. Topics included military construction across Korea, the Incheon Tidal Basin, the trans-Korean pipeline, work in Japan, emergency construction, FED aviation, and North Korean tunnel detection, all within the context of Korea's broader political and economic history. HRA conducted original primary-source research at the District in Seoul, Republic of Korea, and additional research at the National Archives and public repositories, collecting documentary material, photographs and slides, maps, and digital images. In addition, HRA conducted more than a dozen oral history interviews and utilized nearly a dozen more, each one transcribed and incorporated into the history manuscript when relevant. HRA also provided photo captions and placement suggestions, edited each chapter internally, and maintained a project research archive for transmittal to USACE.

History of the  
Portland District  
U.S. Army Corps  
of Engineers

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Senior Historian and Technical Advisor for production of an updated administrative history for the Portland District. The history focused on the years 2000 to 2015 and built upon HRA's previous administrative history for the District, *Currents of Change: A History of the Portland District, U.S. Army Corps of Engineers, 1980–2000*. The updated history, *Engineering in the Twenty-First Century: A History of the Portland District of the U.S. Army Corps of Engineers, 2000–2015*, examined the work of the District in the twenty-first century and covered such topics as environmental mitigation, maintenance of aging infrastructure and hydroelectric projects, navigation, and technological changes. It was published in December 2019.

History of the  
Philadelphia  
District U.S. Army  
Corps of  
Engineers

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Senior Historian and Editor for an administrative history of the USACE, Philadelphia District, from 1972 to the present. Research for the project involved collecting documents from the Philadelphia District, researching at local historical societies, and conducting oral histories.

History of the  
Baltimore District  
U.S. Army Corps  
of Engineers

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Project Manager, Principal Investigator, and Co-Author for an administrative history of the USACE, Baltimore District, from 1975 to the present. Research for the project involved collecting documents from the Baltimore District, researching at state archives, and conducting oral histories. Final published manuscript entitled *An Era of Change: A History of the Baltimore District, U.S. Army Corps of Engineers, 1974–2008* (Baltimore: Baltimore District, U.S. Army Corps of Engineers, October 2010).

## Other Studies

Product Liability Case, Texas <u>[Confidential]</u>	Engaged as an expert to conduct research on a particular product and its period of production, and the corporate history affecting the product and its model line.
Database of Organization Records and Selection/Review of Key Historical Documents for Common Cause, Washington, D.C. <u></u>	HRA assisted Common Cause in assessing, organizing, and producing an inventory of the organization's historical materials. Materials were held by multiple state organizations, a central office, and in a document storage facility.
Historical Investigation of Private Family Cemetery, Columbus, Ohio <u></u>	Senior Historian, Project Manager, and Principal Investigator of the history of a small family cemetery in Upper Arlington, Ohio. HRA conducted research online and in area repositories and provided recommendations for additional locations where research might be undertaken.
Historic Expansion of Bakery Product <u>[Confidential]</u>	Project Manager and Principal Investigator for research on the production, distribution, marketing and sales of a particular brand of bread in the late 1970s and early 1980s for a trademark litigation case.
Wild Turkey History <u></u>	Researcher for a project assisting TBA Global with developing historical content for a new visitor center at the Wild Turkey Bourbon distillery in Lawrenceburg, Kentucky.

## Experience with Other Firms

Researcher, Morgan Angel & Associates, LLC, Washington, D.C. <u></u>	Located, assessed, organized, summarized, and interpreted a wide range of historical documents for clients. Provided interpretive guidance for litigators and other clients and participated in the production of policy histories, particularly in the field of natural resources management on Indian reservations and federal environmental policy.
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## Selected Publications and Presentations

<u>2015</u>	"Why Litigation-Driven History Matters: Lessons Learned from the Secret History of TCE," <i>The Public Historian</i> 37:1 (February 2015), 46-53.
<u>2012</u>	Co-author with Emily Greenwald and Patrick O'Bannon, "Historians as Experts, Consultants, and Corporate Designees: Help for Your Litigation," <i>SideBAR</i> , Spring 2012, 3-4.